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17
18 **UNITED STATES DISTRICT COURT**
19 **FOR THE DISTRICT OF ARIZONA**

20 Jessica Kahraman, *et al.*,
21 Plaintiffs,
22 v.

23 The State of Arizona, *et al.*,
24 Defendants.

Case No.: CV-22-00375-PHX-SRB

**SECOND STIPULATION TO
EXTEND CASE MANAGEMENT
ORDER [DOCS. 128, 141, 196]
DEADLINES**

(Hon. Susan R. Bolton)

25 The parties, by and through their respective undersigned counsel, hereby submit this
26 Second Stipulation to Extend Case Management Order [Docs. 128, 141, 196] Deadlines.
27 The parties affirm that this request is made in good faith, as discussed below, and not for
28 purposes of delay.

In March 2024, Plaintiffs sent records requests and/or served subpoenas for records to numerous medical providers, pharmacies, and other similar entities. Despite Plaintiffs' best efforts in reaching out and following up on those requests, most of the entities contacted have not yet either sent responsive documents or stated that they have no responsive documents. Additional time is needed to obtain those documents and analyze

1 them to determine whether depositions are also necessary to adequately prepare for trial.
2 Additionally, in November 2023 and March 2024, this Court dismissed Defendants Drew
3 Kaplan-Siekman (Doc. 188) and Southwest Human Development (“SWHD”) (Doc. 202),
4 respectively. Since March 2024, Plaintiffs several times requested dates to depose Ms.
5 Kaplan-Siekman and Ms. Carla White, both employees of SWHD, from SWHD counsel
6 without response. Today, 9 July 2024, Plaintiffs received an email from a different counsel
7 indicating that he has been engaged to represent Ms. Kaplan-Siekman. It is presumed but
8 currently not confirmed whether this new counsel also represents Ms. White. The parties
9 anticipate working with this new counsel to schedule those depositions. Finally, 19 July
10 2024 is the current deadline for engaging in settlement discussions. The parties have not
11 been able to get on the schedule of a properly experienced neutral to meet that deadline
12 and believe several other material depositions are necessary before settlement discussions
13 will have a realistic chance of resolving this matter.

14 For the foregoing reasons, the parties through their respective counsel assert that
15 good cause exists to extend the current scheduling order deadlines as follows:

EVENT	CURRENT DEADLINE	NEW DEADLINE
Deadline for completing fact discovery, including written discovery and fact witness depositions	July 10, 2024	September 27, 2024
Deadline to complete expert witness depositions	August 27, 2024	October 28, 2024
Deadline to engage in good faith settlement talks	July 19, 2024	September 13, 2024
Dispositive motions or motions challenging experts	September 20, 2024	December 16, 2024
Deadline for Motions in Limine	January 31, 2025	April 11, 2025
Deadline to file responses to Motions in Limine	February 10, 2025	April 25, 2025
Deadline to submit Joint Proposed Pretrial Order	February 7, 2025	April 18, 2025

Pretrial Conference	March 13, 2025, at 10:00 am	To be vacated and rescheduled
Jury Trial	March 24, 2025, at 9:00 am	To be vacated and rescheduled

A proposed form of order is attached.

RESPECTFULLY SUBMITTED this 9th day of July 2024.

MILLS & WOODS LAW PLLC

By /s/ Thomas A. Connelly

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By /s/ Larry J. Crown

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CERTIFICATE OF SERVICE

I hereby certify that on July 9, 2024, I electronically transmitted the foregoing document to be filed electronically with the Clerk's Office through the CM/ECF System for filing and transmittal of a Notice of Electronic Filing to be served on all counsel of record via the Court's CM/ECF system.

/s/ Thomas A. Connelly